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The Honorable Eric N. Vitaliano
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

November 1, 2024

Re: United States v. Siyang Chen 22-CR-158-ENV

Dear Judge Vitaliano:

The undersigned is counsel to Siyang Chen in the above-captioned matter, currently on trial in front of Your Honor. As Your Honor is aware, the MDC, where Mr. Chen is housed, has experienced frequent lockdowns over the past several months. Currently, the MDC has been under a days-long lockdown for reasons that have not been made clear. Mr. Chen has thus been confined to his cell and not able to access the law library, or the discovery in this case while actively on trial.

We therefore write to respectfully request Your Honor enter an Order directing the MDC to allow Mr. Chen access to the law library, despite the ongoing lockdown, so that he may review the discovery in this case, communicate with counsel, perform legal research, and otherwise assist in his defense at trial.

Thank you for your consideration of this matter, we are available should Your Honor require any further information.

Respectfully submitted,

Ethan Van Buren

Ethan Van Buren, Esq.